

WEIL, GOTSHAL & MANGES LLP  
Richard W. Slack (*pro hac vice*)  
(richard.slack@weil.com)  
Jessica Liou (*pro hac vice*)  
(jessica.liou@weil.com)  
Matthew Goren (*pro hac vice*)  
(matthew.goren@weil.com)  
767 Fifth Avenue New York, NY 10153-0119  
Tel: 212 310 8000  
Fax: 212 310 8007

KELLER BENVENUTTI KIM LLP  
Jane Kim (#298192)  
(jkim@kbbkllp.com)  
David A. Taylor (#247433)  
(dtaylor@kbbkllp.com)  
Thomas B. Rupp (#278041)  
(trupp@kbbkllp.com)  
650 California Street, Suite 1900  
San Francisco, CA 94108  
Tel: 415 496 6723  
Fax: 650 636 9251

*Attorneys for Debtors and Reorganized Debtors*

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

**In re:**

Bankruptcy Case No. 19-30088 (DM)

**PG&E CORPORATION,**

Chapter 11

**- and -**

(Lead Case) (Jointly Administered)

**PACIFIC GAS AND ELECTRIC  
COMPANY,**

**Debtors.**

**REORGANIZED DEBTORS' REPORT ON  
RESPONSES TO EIGHTEENTH  
SECURITIES CLAIMS OMNIBUS  
OBJECTION (DUPLICATE CLAIMS) AND  
REQUEST FOR ORDER BY DEFAULT AS  
TO UNOPPOSED OBJECTIONS**

- ☐ Affects PG&E Corporation  
☐ Affects Pacific Gas and Electric  
Company  
☒ Affects both Debtors

[Re: Dkt. No. 11674]

*\* All papers shall be filed in the Lead  
Case, No. 19-30088 (DM).*

**Resolving Objections Set for Hearing  
January 18, 2022 at 10:00 a.m. (Pacific Time)**

1 **REQUEST FOR ENTRY OF ORDER BY DEFAULT**

2 PG&E Corporation (“**PG&E Corp.**”) and Pacific Gas and Electric Company (the “**Utility**”), as  
3 debtors and reorganized debtors (collectively, the “**Debtors**” or the “**Reorganized Debtors**”) in the  
4 above-captioned chapter 11 cases (the “**Chapter 11 Cases**”) hereby request, pursuant to Rule 9014-  
5 1(b)(4) of the Bankruptcy Local Rules for the United States District Court for the Northern District of  
6 California, as made applicable to these Chapter 11 Cases by the *Second Amended Order Implementing*  
7 *Certain Notice and Case Management Procedures*, entered on May 14, 2019 [Docket No. 1996], that  
8 the Court enter an order by default on the *Reorganized Debtors’ Eighteenth Securities Claims Omnibus*  
9 *Objection (Duplicate Claims)* [Docket No. 11674] (the “**Eighteenth Securities Claims Omnibus**  
10 **Objection**”).

11 **RELIEF REQUESTED IN THE**  
12 **EIGHTEENTH SECURITIES CLAIMS OMNIBUS OBJECTION**

13 The Eighteenth Securities Claims Omnibus Objection seeks to disallow and expunge certain  
14 proofs of claim that duplicate others submitted in the Chapter 11 Cases. The claims subject to the  
15 Eighteenth Securities Claims Omnibus Objection are listed in **Exhibit 1** to that Objection.

16 **NOTICE AND SERVICE**

17 The Reorganized Debtors filed the *Notice of Hearing on Reorganized Debtors’ Eighteenth*  
18 *Securities Claims Omnibus Objection (Duplicate Claims)* [Docket No. 11676] (the “**Notice of**  
19 **Hearing**”). The Eighteenth Securities Claims Omnibus Objection was supported by the *Declaration of*  
20 *Justin R. Hughes in Support of Reorganized Debtors’ Eighteenth Securities Claims Omnibus Objection*  
21 *(Duplicate Claims)* [Docket No. 11675] (the “**Hughes Declaration**”). The Eighteenth Securities Claims  
22 Omnibus Objection, the Notice of Hearing, and the Hughes Declaration were served as described in the  
23 *Certificate of Service* of Alain B. Francoeur, filed on December 10, 2021 [Docket No. 11689] (the  
24 “**Certificate of Service**”). As further described in the Certificate of Service, on December 7, 2021, each  
25 holder of a claim listed on **Exhibit 1** to the Eighteenth Securities Claims Omnibus Objection received a  
26 notice including the claim number, debtor, claim amount, and the basis for the Reorganized Debtors’  
27 objection with respect to the applicable claim to be disallowed and expunged.  
28

The deadline to file responses or oppositions to the Eighteenth Securities Claims Omnibus Objection has passed. The Reorganized Debtors have received the following responses:

Docket No.	Claimant	Claim Nos.	Resolution
Informal	Hartford Claimants	100707, 101156, 101955, 101917, 101781	The Reorganized Debtors are working to consensually address this informal response and have removed these claims from <b>Exhibit A</b> to this Request. This matter has been continued to the February 2, 2022, omnibus hearing.
Informal	Vanguard Claimants	102273, 102541, 102464, 102276, 102546, 102516, 102556, 102502, 102554, 102490, 102550, 102561, 102465, 102559, 102449, 102213, 102469, 102462, 102461, 102484, 102480, 102565, 102456, 102498, 102596, 102444, 102451, 102455, 102298, 102296	The Reorganized Debtors are working to consensually address this informal response and have removed these claims from <b>Exhibit A</b> to this Request. This matter has been continued to the February 2, 2022, omnibus hearing.

**DECLARATION OF NO OPPOSITION RECEIVED**

The undersigned hereby declares, pursuant to 28 U.S.C. § 1746, under penalty of perjury that:

1. I am a member of the law firm of Weil, Gotshal & Manges LLP (“Weil”), counsel for the Reorganized Debtors.

2. The Court’s docket in the Chapter 11 Cases has been reviewed and Weil has determined that no responses have been filed with respect to the Eighteenth Securities Claims Omnibus Objection except as described herein.

1 WHEREFORE, the Reorganized Debtors hereby request entry of an order disallowing and  
2 expunging the proofs of claim listed in the column headed "Claim to be Disallowed/Expunged" in  
3 **Exhibit A** to this Request, which listed claims identical to those in **Exhibit 1** to the Eighteenth Securities  
4 Claims Omnibus Objection, except as otherwise discussed above.

5 Dated January 11, 2021

6 **WEIL, GOTSHAL & MANGES LLP**

7 **KELLER BENVENUTTI KIM LLP**

8  
9 By: /s/ Richard W. Slack

10 Richard W. Slack

11  
12 *Attorneys for Debtors and Reorganized Debtors*